

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
KNOXVILLE DIVISION**

JESSE PIERCE and MICHAEL PIERCE,)	
on behalf of themselves and all others)	
similarly situated,)	CASE NO. 3:13-cv-641
)	
Plaintiffs,)	Magistrate Judge: C. Clifford Shirley, Jr.
)	
vs.)	
)	
WYNDHAM VACATION RESORTS,)	COLLECTIVE ACTION COMPLAINT
INC., and WYNDHAM VACATION)	FOR VIOLATIONS OF THE FAIR
OWNERSHIP, INC.,)	LABOR STANDARDS ACT OF 1938
)	
Defendants.)	

PLAINTIFFS' STATEMENT OF FACTS PRECLUDING SUMMARY JUDGMENT

Come Plaintiffs and submit this Statement of Facts Precluding Summary Judgment.

1. Since bankruptcy filings are a matter of public records, Defendants were on notice of Jeremy Saine's bankruptcy proceeding as early as December 28, 2018.

RESPONSE:

2. Since bankruptcy filings are a matter of public records, Defendants were on notice of Rachael Taylor's bankruptcy proceeding as early as January 29, 2018.

RESPONSE:

3. Since bankruptcy filings are a matter of public records, Defendants were on notice of Sean Jeter's bankruptcy proceeding as early as May 20, 2014.

RESPONSE:

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on March 9, 2021, a true and correct copy of the foregoing has been served on the following individuals via the court's electronic service:

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